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*Attorneys for Defendant and
Counterclaimant Skyryse, Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,
Plaintiff,
v
SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,
Defendants.

SKYRYSE, INC.,
Counterclaimant,
v
MOOG INC.,
Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-
MAR

**DEFENDANTS' NOTICE OF
MOTION AND MOTION TO
OVERRULE MOOG'S
OBJECTION TO SKYRYSE'S
DISCLOSURE OF
CONFIDENTIAL
INFORMATION TO VINCENT
SOCCI**

Discovery Cut-Off: April 12, 2024
Pre-Trial Conference: August 12,
2024; 8:30 a.m.
Trial: August 27, 2024

Hearing: June 28, 2023
Time: 8:30 a.m.
Judge: Hon. Margo A. Rocconi
Location: Courtroom 790, 7th Floor

1 **TO THE ABOVE-CAPTIONED COURT, AND TO ALL PARTIES**
 2 **AND THEIR COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that at 11:00 a.m. on June 14, 2023, or as soon
 4 thereafter as the matter may be heard before the Honorable Judge Margo A. Rocconi
 5 in Courtroom 790 of the United States District Court, Central District of California,
 6 located at 350 West 1st Street, Los Angeles, California 90012, Defendant and Coun-
 7 terclaimant Skyryse, Inc. will and hereby does move for an order overruling Moog's
 8 objection to, and thus permitting, Skyryse's disclosure of information Moog has des-
 9 ignated as confidential under the protective order to Skyryse's expert, Vincent Socci.

10 Pursuant to Local Civil Rule 37-1, the parties conducted a conference of coun-
 11 sel on March 14, 2023. After the parties determined they had reached impasse, pur-
 12 suant to the Honorable Judge Rocconi's discovery motion procedures, Skyryse
 13 emailed the courtroom deputy on March 30, 2023, seeking a telephone conference
 14 with the Court. On April 18, 2023, the courtroom deputy emailed the parties instruct-
 15 ing that Skyryse may file this motion without a telephonic conference.

16 This motion is based on this notice of motion and Skyryse's portion of the
 17 accompanying Joint Stipulation, the accompanying Declaration of Kelley M. Storey
 18 and its exhibits, the records and papers on file in this action, any material of which
 19 this Court takes judicial notice, and such other written or oral argument as may be
 20 presented at or before the time this motion is taken under submission by the Court.

1 Dated: June 7, 2023

Respectfully submitted,

2 LATHAM & WATKINS LLP

3 By /s/ Gabriel S. Gross

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